

# EXHIBIT A

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF HAMPTON	)	CIVIL ACTION NO.: 2020-CP-25-_____
	)	
GARY BRYANT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b><u>SUMMONS</u></b>
	)	<i>(Jury Trial Demanded)</i>
	)	
HODGES MANAGEMENT COMPANY,	)	
INC. AND DAVID JOHNSON,	)	
	)	
Defendants.	)	

**TO THE DEFENDANTS ABOVE-NAMED:**

**YOU ARE HEREBY SUMMONED** and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at Peters, Murdaugh, Parker, Eltzroth & Detrick, PA, 101 Mulberry Street East, P.O. Box 457, Hampton, SC 29924, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: /s/ William F. Barnes, III  
William F. Barnes, III  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
Phone: (803) 943-2111  
Fax: (803) 914-2014  
wbarnes@pmped.com

ATTORNEYS FOR PLAINTIFF

August 26, 2020  
Hampton, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF HAMPTON	)	CIVIL ACTION NO.: 2020-CP-25-_____
	)	
GARY BRYANT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b><u>COMPLAINT</u></b>
	)	<i>(Jury Trial Demanded)</i>
	)	
HODGES MANAGEMENT COMPANY,	)	
INC. AND DAVID JOHNSON,	)	
Defendants.	)	

The Plaintiff alleges:

1. The Plaintiff, Gary Bryant ("Bryant"), is a citizen and resident of Richland County, South Carolina.
2. The Defendant, Hodges Management Company, Inc. ("Hodges"), is a foreign corporation which owns and operates the Kentucky Fried Chicken/Taco Bell ("KFC") restaurant in Hampton County, South Carolina.
3. The Defendant, David Johnson ("Johnson"), is upon information and belief, a citizen and resident of Hampton County, South Carolina.
4. At all times mentioned below, Defendant Johnson was upon information and belief the manager of the KFC restaurant and was operating the restaurant within the scope of his employment. Defendant Johnson possessed and exercised the authority to manage, direct, superintend, restrict, regulate, govern, administer and/or oversee the management of the Defendant Hodges Management Company's Hampton KFC restaurant and to ensure compliance with all policies, standards, or procedures.
5. The Court has jurisdiction over the parties.

6. Venue is proper in the Hampton County Court of Common Pleas as it is the county where the most substantial part of the act or omission occurred.

7. On October 6, 2017, Bryant was a customer at the KFC restaurant in Hampton, South Carolina. As he was walking on the premises, Bryant slipped and fell on a foreign substance on the floor causing him to fall and hit his head. Striking his head caused Bryant to experience a seizure and suffer severe and permanent injuries.

8. The Plaintiff's injuries were due to and proximately caused by the following acts of negligence, carelessness, recklessness, willfulness, wantonness, and grossly negligent conduct of the Defendants in one, some or all of the following particulars:

- a. In failing to maintain its premises in a proper condition for the invited public;
- b. In leaving a foreign substance floor, constituting a dangerous condition for the invited shopping public;
- c. In failing to adequately hire, train, and retain employees knowledgeable about how to maintain its premises;
- d. In creating, or allowing to remain, a foreign substance likely to lead to personal injury;
- e. In failing to warn the plaintiff of the foreign substance;
- f. In failing to follow its policies, standards, or procedures regarding foreign substances on the floor;
- g. In failing to act as a reasonably prudent company would act under the same or similar circumstances;
- h. In operating a company in reckless disregard for the safety of the invited public;
- i. In failing to inspect the premises for latent defects; and
- j. In such other particulars as the evidence may establish.

9. As a result of the aforementioned accident, Plaintiff suffered severe and permanent injuries from which he has suffered and will continue to suffer physical pain and mental anguish; and has

expended and will in the future expend, monies for medical care and treatment, and caused to lose the enjoyment of life.

10. By reason of and in consequence of the above-mentioned negligent, careless, reckless, willful, and wanton conduct of the Defendants, Plaintiff suffered the injuries, losses, and damages complained of, for which the Defendants are liable.

WHEREFORE, Plaintiff prays for judgment against the Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs of this action, and for such other and further relief as the Court may deem just and proper.

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

BY: /s/ William F. Barnes, III  
William F. Barnes, III  
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P.O. Box 457  
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ATTORNEYS FOR PLAINTIFF

August 26, 2020  
Hampton, South Carolina

## IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR HAMPTON COUNTY

GARY BRYANT

Plaintiff/Petitioner

DOCKET NO: 2020CP2500340

FILING DATE: 08/26/2020

vs.

HODGES MANAGEMENT COMPANY, INC., ET AL.

Defendant/Respondent

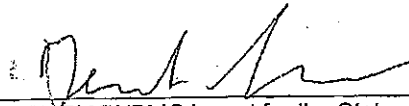
AFFIDAVIT OF SERVICE OF:

SUMMONS; COMPLAINT; LETTER DATED 09/21/2020

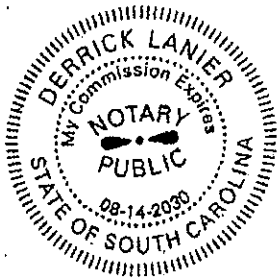
The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.

On the 23rd day of September, 2020, at 2:58 PM, at the address of 2 OFFICE PARK CT SUITE 103, COLUMBIA, Richland County, SC 29223; this affiant served the above described documents upon HODGES MANAGEMENT COMPANY, INC. c/o CT CORPORATION SYSTEM, REGISTERED AGENT by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with CT CORPORATION SYSTEM, REGISTERED AGENT, Kay Dixon, assistant secretary, PERSON AUTHORIZED TO ACCEPT, Who accepted service with direct delivery, with identity confirmed by subject stating their name, a black-haired black female approx. 25-35 years of age, 5'-5'4" tall and weighing 120-140 lbs with glasses..

Date: 9/24/2020
  
 Wendy Lanier, Reg. # N/A, N/A

 SUBSCRIBED AND SWORN to before me this 24 day of September, 20 20
  
 NOTARY PUBLIC in and for the State of South Carolina

My commission expires \_\_\_\_\_



REF: 008314-020657

FOR: Peters Murdaugh Parker Eltzroth

PAGE 1 OF 1

ORIGINAL AFFIDAVIT OF SERVICE



Tracking #: 0058037569



ELECTRONICALLY FILED - 2020 Sep 25 9:00 AM - HAMPTON - COMMON PLEAS - CASE#2020CP2500340

## IN THE COURT OF COMMON PLEAS OF THE STATE OF SOUTH CAROLINA FOR HAMPTON COUNTY

GARY BRYANT

Plaintiff/Petitioner

DOCKET NO: 2020CP2500340

FILING DATE: 08/26/2020

vs.

HODGES MANAGEMENT COMPANY, INC.; ET AL

Defendant/Respondent

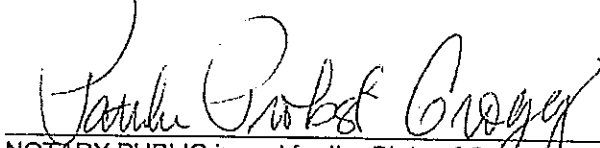
AFFIDAVIT OF SERVICE OF:  
COVER LETTER; SUMMONS; COMPLAINT

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.

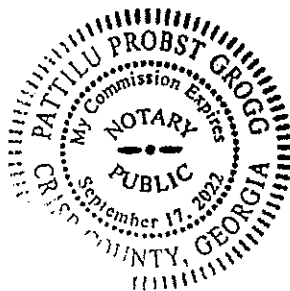
On the 6th day of November, 2020, at 3:06 PM, at the address of 7 NORTH MAIN STREET, STATESBORO, Bulloch County, GA 30458; this affiant served the above described documents upon HODGES MANAGEMENT COMPANY, INC. c/o L. INMAN HODGES, SR., REGISTERED AGENT by then and there personally delivering 1 true and correct copy(ies) thereof, by then presenting to and leaving the same with Paula Freeman, CFO, CORPORATE OFFICER, who accepted service with direct delivery, with identity confirmed by subject stating their name, a red-headed white female approx. 55-65 years of age, 5'6"-5'8" tall and weighing 140-160 lbs..

Date: 11-10-2020


Ken Hendrix, Reg. # n/a, Superior Court of Crawford County

SUBSCRIBED AND SWORN to before me this 10<sup>th</sup> day of November, 2020.


NOTARY PUBLIC in and for the State of Georgia

My commission expires 9-17-2022

ELECTRONICALLY FILED - 2020 Nov 11 9:10 AM - HAMPTON - COMMON PLEAS - CASE#2020CP2500340

REF: 008314-020657

FOR: Peters Murdaugh Parker Eltzroth

PAGE 1 OF 1

ORIGINAL AFFIDAVIT OF  
SERVICE

Tracking #: 0060246351





November 14, 2020

Dear April Musser:

The following is in response to your request for proof of delivery on your item with the tracking number:  
**9489 0090 0027 6091 6199 05.**

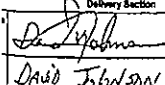
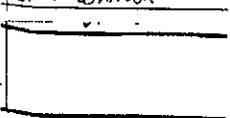
#### Item Details

<b>Status:</b>	Delivered
<b>Status Date / Time:</b>	November 14, 2020, 11:44 am
<b>Location:</b>	BRUNSON, SC 29911
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™
	Return Receipt Electronic
<b>Recipient Name:</b>	David Johnson

#### Shipment Details

<b>Weight:</b>	1.0oz
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#### Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
United States Postal Service®  
475 L'Enfant Plaza SW  
Washington, D.C. 20260-0004

ELECTRONICALLY FILED - 2020 Nov 16 8:18 AM - HAMPTON - COMMON PLEAS - CASE#2020CP2500340